



Frequently Asked Questions

State Fiscal Year 2023 Victims of Crime Act Grant Funding

Summary: The Governor's Office of Crime Prevention, Youth, and Victim Services prepared this list of answers to several frequently asked questions from victim services providers regarding the SFY 2023 VOCA grant. Our office is here as a resource for our subgrantees and should any clarification or further support be needed, do not hesitate to reach out to our office.

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Applications and Awards

- 1. Our organization needs more funding this year. Is it okay to add items to our budget that we need?**
 - a. No. Your application total must match or be lower than the amount designated for your organization in the SFY23 VOCA NOFA. If your application is higher than the designated amount, GOCPYVS will make adjustments to your award to ensure that it is equal to your prior award.
- 2. If your application requires no changes, do you need to resubmit your application?**
 - a. Yes. All applications were returned to applicants for review and correction. All applications will need to be resubmitted.
 - b. Please review your applications based on the technical assistance provided on the October 14 technical assistance call. If after review, you find no need to make corrections, you can resubmit your application again without adjustments. Please note that approval from SFY 2019 does not necessarily mean that the same application will be approved in SFY 2023. Unallowable items will not be approved, regardless of what may have been approved in the past.

- 3. For applicants who do not need to make corrections, will they be awarded on a rolling basis or will they be held until Nov. 14?**
 - a. Applications will be reviewed and approved as they are resubmitted. You do not need to wait until the November 14 submission date to submit. The sooner you submit your application, the sooner it will be approved. This is especially important for programs that receive monthly reimbursement instead of quarterly.
- 4. If we haven't received notification that there was a problem with our application, should we assume it is fine?**
 - a. You will not be notified of any problems with your previously submitted application. All applications are being returned to all subgrantees. Please review the application for unallowable items before resubmitting.
 - b. Applications will be under the original application number.
- 5. What is the approval time for the GANS?**
 - a. Please allow up to 7 days for a GAN to be fully processed.
- 6. Will there be an option for "after-the-fact" GANS for required time-sensitive expenses?**
 - a. After-the-fact GANs may be approved. However, any activities that deviate from an approved application may not be approved if GOCPYVS determines they are inconsistent with the grant.
 - b. GANs are no longer being accepted for the SFY 2022 VOCA Grant as the grant closed on 9/30/22.
 - c. If you submit a GAN for an expense that was not previously approved, you are responsible for the expense if the GAN is denied.
- 7. Maryland's SFY 2023 Budget requires that GOCPYVS provide level funding if funding is available. How can my organization secure that funding if we don't have activities outlined for its use?**
 - a. Funding cannot be awarded to any organization without the specific intended uses of that funding being outlined in the budget application.
 - b. GOCPYVS is responsible for ensuring that all VOCA-funded projects and programs are allowable expenditures.
 - c. GOCPYVS must receive specific information regarding your intended use of funding to determine if that cost is allowable.
 - d. The budget language was not intended to provide supplemental or reserve funding.
- 8. Is there any plan in place to address any gaps in funding that may result from the application deadline being extended?**
 - a. There will be no gap in funding. All awards will be back-dated to October 1, 2022.
- 9. Why are these changes happening now when this is a continuation grant?**
 - a. Although level funding is guaranteed, not all programs have submitted the same applications from year to year, so services have changed for some programs. Additionally, it is GOCPYVS' responsibility to award funding in alignment with OVC requirements regardless of waivers and allowances that were permitted in the past due to COVID or other reasons.

10. We provide wellness programming for victims, some of whom have been victimized in the past. Can these services be supported by VOCA?

- a. Medical wellness is generally unallowable. Wellness such as yoga, art therapy, etc., would be considered allowable.

Salaries and Staff

11. Can VOCA funding be utilized to cover salaries for the executive director, financial officer, deputy director, office manager, fiscal agent, administrator, or other similar positions?

- a. Executive director and board member's salaries are unallowable costs under VOCA.
- b. However, VOCA funds can be used for the portion of time spent directly serving victims (split-role), or supervising staff directly serving victims, grant administration, and coordination activities.
- c. Time and effort certifications must be kept.
- d. Please provide a job description of the position's responsibilities.
- e. Include budget justifications for all proposed personnel, including name, title, duties, and current funding of personnel.
- f. You must ensure that this salary is not included in in-direct costs as well.

12. Our executive director has been in the grant for 4 years because of his work building relationships. Is this now unallowable?

- a. Executive director and other management salaries are specifically addressed as being prohibited in the VOCA guidance from OVC unless they are doing an otherwise allowable act.
- b. There should be a description of their duties in the application.
- c. As stated above, you must ensure that this salary is not included in in-direct costs as well.

13. What if the executive director or deputy director is supervising the staff that is directly serving victims or the executive director or deputy director is managing the grant through data collection, grant reports, etc.

- a. Direct supervision of staff that is providing direct services is allowable. Time and effort documentation must be kept for future auditing purposes. Only the portion of time spent performing direct services or other allowable duties can be covered with VOCA funds, not the entire salary.
- b. Duties related to data collection and grant reports are considered administrative duties and should be charged as indirect costs.
- c. If there are questions, please provide details, and GOCOPYVS will contact OVC for further guidance.

14. Who should complete financial reports and how will that task be fulfilled if the executive director, office manager, or financial officer's time is not an allowable expense?

- a. The cost associated with such activities should be included in your agency's indirect cost portion of the grant.

15. Can our organization utilize VOCA on bonuses for staff retention?

- a. Possibly. Bonuses are allowable.
- b. COLAs or salary increases (raises) are more favored by OVC than bonuses.
- c. You must have an organizational bonus policy included with your application. If approved, bonuses will require significant justification and documentation that every employee within your organization will receive a bonus regardless of their funding source.
- d. VOCA funding can only be used for bonuses or raises for VOCA-funded staff. You must have available funding to provide bonuses for all staff, including those funded by other sources.
- e. Multiple bonuses over the course of the same funding cycle will not be approved. Consider COLAs or salary increases to support employee retention moving forward.

16. Can VOCA funding be utilized to pay a wage for paid volunteers? What about hosting a volunteer appreciation event as a way of saying thank you?

- a. No. Volunteers cannot be paid with VOCA funding. Additionally, you cannot use VOCA funding to purchase food or trinkets for a volunteer appreciation event or meal.

17. My organization hired a fully remote employee during COVID. Now that staff is starting to return to the office, can we use VOCA to pay commuting expenses to and from work?

- a. Possibly. If the employee was hired as fully remote and your organization is not requiring in-office work for your staff, you may be able to cover commuting expenses for that individual. You must attach a copy of the contract or job description to support this.
- b. Additionally, please keep in mind that you are required to justify how a fully virtual staff member is providing VOCA-allowable services to support the use of VOCA funding for the role.
- c. Lastly, if this employee is contractual, commuting expenses should not be permitted in contracts moving forward. A salary increase is a more appropriate way to address this issue in future years.

18. Are administrative duties relating to auditing charts for quality assurance; preparing for and leading SART meetings; and preparing for and leading FNE staff meetings allowable costs?

- a. Activities that support a coordinated and comprehensive response to crime victims' needs by direct service providers are allowable costs.
- b. Provide details as to why these activities are necessary to carry out the direct services.

19. Is the process of training nurses to become forensic nurse examiners for victims an allowable cost?

- a. Training is an allowable cost.

20. What is the maximum consultation rate for contractors? For example, professional clinicians that provide supervision to our staff under consultation, but their contracted rate is higher. Is there an exception for those clinicians, or do we need to retitle?

- a. The federally approved consultant rate for each grant-making component is \$650 per day or \$81.25 per hour.
- b. If you are seeking the services of a consultant that is more than the maximum rate, you must obtain approval from OVC.

External Support

21. My organization subawards to another organization for certain services. Is there anything special we need to supply to support this?

- a. Yes. If you are partnering with another organization and plan to contract with them for VOCA-supported activities, you must include a copy of the contract and/or MOU with that organization. The contract or MOU must outline the specific activities to be carried out by that organization.

22. Can my organization use VOCA funding to hire a forensic interviewer or forensic nurse examiner? Can VOCA be used to pay for SAFE exams or components of SAFE exams?

- a. Yes, forensic medical evidence collection examinations for victims are allowable to the extent that other funding sources such as state appropriations are not able to cover the expense. An organization cannot request VOCA funds for any staff, item, or service that is reimbursed through SARU. The use of VOCA funding is only allowable for items not covered by SARU or any other revenue source. Doing so would constitute supplanting, which is unallowable.
 - i. It is important that organizations follow the appropriate guidelines for billing to each funding source. For example, some expenditures should be reimbursed through SARU, while VOCA funds can cover other expenses as outlined in the OVC guidance.
 - ii. Organizations must list names of VOCA-funded staff in their applications and quarterly reports. Additionally, if you are submitting reimbursements for your staff's services through SARU, you must also provide the name of the staff member performing those services so that GOCOPYVS can ensure that there are no supplanting violations. More information on supplanting [can be found here](#).
- b. You must supply a detailed spending plan for what services will be covered by VOCA versus what will be billed to SARU.
- c. Additionally, you must supply an MOU or agreement with your billing department or service that details their understanding of what can and cannot be billed to SARU based on this divided funding.

- 23. Are activities such as general case acceptance, meetings with legal counsel, or specialized trainings that support client needs allowable if the time is allocated proportionately to all funding codes based on direct time charged to the grant?**
- a. Coordination activities, legal services, and personal advocacy for victims are allowable costs with VOCA funding.
- 24. How can I list all training costs for the entire year when we don't know specifically what trainings will be available and what the registration costs will be?**
- a. Please use estimations based on the prior year's registration fees or current fees listed on websites for trainings that you send staff to. Additionally, airfare/hotel rate estimates can be based on website searches. If there are conferences that your staff have attended in the past, using the financial numbers from a prior year is an acceptable estimation tool. Please provide an explanation of the travel and related expenses.
- 25. Some expert trainers or similar costs are not known and entered until closer to the training. We have generally submitted these prior to reimbursement but not with the application. Are you suggesting this is not permissible?**
- a. If the expert trainer is someone you have contracted with in the past, an old contract will suffice. If you have a cost estimate in an email or from a website for the trainer, that is acceptable as well.
 - b. As part of the budget process, all items that you plan on applying to the grant should be included. If an allowable budgeted item actually costs more or less than budgeted, then utilize the GAN process.
- 26. Should contractual staff salaries and fringe benefits be categorized under "personnel" or "contractual?" Previously, we placed them in the contractual category, breaking costs down by salary, fringe benefits, and TCC fees.**
- a. They should be classified as contractual.

Building Maintenance and Improvements

- 27. Can VOCA funding be utilized for building improvements?**
- a. No. VOCA cannot be used for construction projects and building improvements that increase the value of a property.
- 28. Can VOCA be utilized for "curb appeal" items and costs that improve the visual aesthetic of the property?**
- a. No. VOCA funds can only be used for expenses that are deemed necessary to carry out the intended purpose of VOCA funding. A good question to ask yourself is: is this necessary for our organization to provide direct services?
 - b. VOCA can be used for items such as snow removal but not for landscaping.

Supplies and Inventory

29. Can I use a portion of my VOCA funds to stockpile furniture, or other resources for future use to fully utilize my award? Do I need to inventory all items purchased with VOCA funds?

- a. No, stockpiling items with VOCA funds with no projected use is inappropriate.
- b. Organizations must have inventory retention policies that abide by [federal guidelines](#).

30. Are we able to purchase supplies for outreach?

- a. Trinkets are not allowable according to the OVC guidance.

31. Can you utilize funding for printers?

- a. Yes.

Billing

32. Can my organization bill for an indirect cost if we do not have a federally negotiated indirect cost rate?

- a. Yes. You may submit up to 10% of your total application for indirect costs. You must itemize your anticipated use of this indirect funding.
- b. If you have a negotiated rate you must use that rate. If you use the de minimis 10% rate, you must do so for all grants, not limited to VOCA.

33. Can you provide examples on what would be considered an "indirect cost?"

- a. Indirect costs are costs that are not readily assignable to a particular project but are necessary to the operation of the organization and the performance of the project. Examples of costs usually treated as indirect include those incurred for facility operation and maintenance, depreciation, and administrative salaries.

34. If your indirect rate is higher than 10% can you utilize your organization's rate?

- a. Yes. If your agency has a federally negotiated indirect costs rate, that should be utilized. The 10% de minimis is for organizations without a federally negotiated rate.

35. Is there any guidance available about how to present the specification of de minimis spending in the "other" section of the budget?

- a. "Indirect" can still be cited as the budget line item, however, the description should contain a breakdown of the items anticipated to be covered with indirect funding. This could include facility rent, utilities, etc. A financial breakdown should be included.
- b. Indirect costs should be described in both the budget and the narrative.

36. Where should we detail the expenses for the indirect cost rate? In the budget narrative, or as separate line items?

- a. Indirect costs should be described in both the budget and the narrative.

37. How should the application detail indirect costs in the budget? Should the phrase "indirect cost" be in the justification of specific budget line items? Is a portion of the annual audit allowable (if the total indirect costs remain under 10%)?

- a. Yes, a portion of the annual audit would be an allowable cost.
- b. Completing VOCA-required time and attendance sheets and programmatic documentation; reports, and statistics; collecting and maintaining crime victims' records; victim satisfaction surveys, and needs assessments; and funding the prorated share of audit costs are allowable.

38. We are a local government agency that pays for expenses and requests reimbursement from GOCOPYVS quarterly. We have contracts that started Oct 1 to provide continuity of services. Are we able to pay these invoices now (prior to the award of the grant) to satisfy our contracted vendors?

- a. The grant will cover allowable expenses starting October 1, 2022.

39. We can't get reimbursed and submit the expenses until the application is approved and awarded and some programs are reimbursed monthly. Waiting until December for reimbursement may negatively impact continuity of services. What should we do?

- a. Please do not wait for the close of the application period on November 14 to submit your application. GOCOPYVS will review and approve applications as they are submitted to expedite the reimbursement process.

40. How are programs supposed to continue with no other funding at this time?

- a. The first quarter starts on October 1 and ends on December 31. GOCOPYVS anticipates making all awards before the close of the first quarter, so reimbursement should not be delayed.

Acronyms:

- I. VOCA - Victims of Crime Act
- II. GOCOPYVS - Governor's Office of Crime Prevention, Youth, and Victim Services
- III. GAN - Grant Adjustment Notice
- IV. NOFA - Notice of Funding Availability
- V. GMS - Grant Management System
- VI. DOJ - U.S. Department of Justice
- VII. OVC - U.S. Department of Justice's Office for Victims of Crime
- VIII. COLA - Cost of Living Adjustment
- IX. MOU - Memorandum of Understanding
- X. SARU - Sexual Assault Reimbursement Unit
- XI. SAFE - Sexual Assault Forensic Exam
- XII. SART - Sexual Assault Response Team
- XIII. TCC - Training Consultant Costs
- XIV. FNE - Forensic Nurse Examiner